

Message

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Sent: 5/29/2018 1:02:20 PM
To: Rykaczewski, Dave A. (Dave.Rykaczewski@wsp.com) [Dave.Rykaczewski@wsp.com]; Cepko, Russ P [Russ.Cepko@cbs.com]
Subject: CBS / Former Westinghouse - Proposed PCB cleanup approach
Attachments: CBS / Former Westinghouse Facility, Compton, CA

Hello David and Russ,

Thank you for your participation on the May 23, 2018 conference call regarding the proposed approach. Below are my comments.

1. Concrete Floors – In situations where a portion(s) of the concrete slab is cut and replaced with new concrete, the PCB concentrations in the removed contaminated portion of the slab can be replaced with half of the analytical detection limit for each of those concentrations when calculating the 95%UCL of the mean of the PCB analytical results after the slab has been remediated as proposed. This comment modifies the attached email that we discussed on May 23, 2018. The underlying soils must be sampled following a grid to determine if PCBs are present.

The concrete slab may serve as a cap for soils beneath the slab that may be impacted by PCBs. Survey coordinates should be recorded for PCB contaminated soil areas. Alternatively, CBS may remove soils underneath the portion of the slab to be replaced if found to be contaminated with PCBs above the cleanup goal and record survey coordinates for those soil locations. If the slab or portions thereof are to serve as a cap, the slab must be properly maintained.

2. Transformer Pit – We recommend that materials other than soil be proposed for backfilling the pit. Also, we recommend that samples be collected from soils beneath the floor of the pit if no samples have been collected already. Follow same process as above. When considering options for the transformer pit walls, the potential for volatilization of PCBs from the wall should be addressed given a metal plate by itself may not control the release of PCBs from the concrete. A two prong approach may be necessary where the metal plate serves as a physical barrier that protects the integrity of the encapsulated surface.
3. HVAC System – CBS is looking further into this system and how it works. We recommend that if insulation is present within HVAC system that it be tested for PCBs. Proper decontamination of certain HVAC system components (e.g., flexible duct work) may not be possible necessitating removal and replacement of those components and proper disposal.
4. Institutional Controls – We need to discuss.
5. Other sections to be included in the application – Decontamination, and offsite disposal sections need to be included. Waste expected to be generated during the cleanup activities for offsite disposal include bulk PCB remediation wastes (e.g., concrete contaminated with PCBs), cleanup wastes (e.g., PPE, rags), and possibly liquid PCB remediation wastes (e.g., water contaminated with PCBs). Decontamination wastes may include spent solvents used for decontamination. Decontamination solvents must meet the requirements in 40 CFR 761.79(d). Best management practices for dust and real-time air dust monitoring during and post PCB remediation activities. We can further discuss this item in the next call.
6. Schedule – A new schedule for the project should be proposed by CBS.

Please call or email me if you have any questions regarding this message.

Best,

Carmen D. Santos

PCB Coordinator



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"I am imagination. I can see what the eyes cannot see. I can hear what the ears cannot hear. I can feel what the heart cannot feel." Zarlenga

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